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**Attorneys for Secured Creditor,
CHASE HOME FINANCE, LLC**

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

IN RE:)	Bankruptcy Case No. 09-41828
SANTIAGO SANCHEZ,)	Docket Control No. WGM-1
)	CHAPTER 13
Debtor.)	<u>HEARING DATE:</u>
)	DATE: January 5, 2010
)	TIME: 1:00 PM
)	CRTRM: 34

**CHASE HOME FINANCE, LLC'S OBJECTION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

**TO THE HONORABLE ROBERT S. BARDWIL, UNITED STATES BANKRUPTCY
COURT JUDGE, THE CHAPTER 13 TRUSTEE, THE DEBTOR'S COUNSEL AND THE
DEBTOR:**

Chase Home Finance, LLC ("Chase") is the holder of a secured claim recorded against property in which the Debtor has an interest. Chase is, therefore, a party in interest and has standing to object to the Chapter 13 Plan proposed by the Debtor.

Chase's claim consists of a Promissory Note secured by a Deed of Trust recorded against the real property located at 1155 Indiana Street, Gridley, California which is the Debtor's principal residence. The total amount due and owing under the Promissory Note is \$148,661.33 and the amount of pre-petition arrearage owed is \$3,458.43. A true and correct copy of Chase's Proof of

1 Claim is attached and incorporated as Exhibit "1." Chase objects to the Debtor's Plan on the
2 following grounds:

3 The Debtor's Plan fails to provide for the pre-petition arrears owed to Chase. See Exhibit
4 "1" attached hereto. Since the Plan does not provide for the cure of default, the Debtor's Plan is not
5 feasible and does not satisfy 11 USC § 1322.

6 Based on the foregoing, Chase respectfully requests that the Court deny confirmation of the
7 Debtor's Chapter 13 Plan or order that the Chapter 13 Plan be amended to provide for payments of
8 Chase's pre-petition arrears as outlined in the attached Exhibit "1."

9 DATED: December 17, 2009

Respectfully Submitted,

10 MALCOLM CISNEROS, A Law Corporation

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12 /s/William G. Malcolm
13 WILLIAM G. MALCOLM
14 Attorney for Secured Creditor,
15 Chase Home Finance, LLC.
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